



January 22, 2019

via email to regs.comments@federalreserve.gov

Ms. Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW.
Washington, DC 20551

Re: **Docket No. R-1639**
RIN 7100-AF30

Dear Secretary Misback:

The California Bankers Association (“CBA”) supports the increase in the threshold level at or below which appraisals would not be required for residential real estate-related transactions from \$250,000 to \$400,000.

CBA shares the Board’s perception that the increase in this threshold will ease regulatory burden while maintaining appropriate safety and soundness standards, and likewise supports the use of real property evaluations that are consistent with safe and sound banking practices for transactions that fall below the threshold or that are otherwise exempt.

Because CBA believes that the answers to the Board’s more specific questions would vary from member institution to member institution, it is not addressing them here, but has asked interested members to respond individually to those questions as they see fit.

Very truly yours,

CALIFORNIA BANKERS ASSOCIATION

A handwritten signature in blue ink, appearing to read 'Martha Evensen Opich', written over the printed name.

By: Martha Evensen Opich
Its: Vice President and Association Counsel